

1 The parties, plaintiff Sean S. May, M.D. and defendants Unum Group (formerly known
 2 as UnumProvident Corporation), and The Paul Revere Life Insurance Company are in the
 3 process of discussing settlement, which may include setting an early mediation within the next
 4 90 days. Accordingly, the parties, through their respective attorneys, respectfully request that the
 5 court approve this stipulation and extend defendants' responsive pleading deadline and the initial
 6 case management conference by 90 days.

7 Pursuant to Northern District Local Rule 6-1(a), the parties, hereby stipulate that
 8 defendants shall have an extension to respond to the complaint from July 7, 2009 to and
 9 including **October 7, 2009**.

10 The parties further stipulate to continue the Case Management Conference presently
 11 scheduled for August 6, 2009 to **November 5, 2009**.

12 Good cause exists for the parties' stipulation and proposed order insofar the continued
 13 dates will promote the public policy of encouraging parties to explore early resolution of
 14 litigation.

15 **IT IS SO STIPULATED.**

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 17 KNOX RICKSEN, LLP

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 19 Dated: June 30, 2009

20 By _____/s/_____
 21 Thomas E. Fraysse
 22 Attorney for Plaintiff
 23 SEAN S. MAY, M.D.

24 WILSON, ELSER, MOSKOWITZ, EDELMAN &
 25 DICKER LLP

26 Dated: June 30, 2009

27 By _____/s/_____
 28 Thomas M. Herlihy
 John T. Burnite
 Attorney for Defendants
 UNUM GROUP (formerly known as
 UNUMPROVIDENT CORPORATION) and THE PAUL
 REVERE LIFE INSURANCE COMPANY

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STIPULATION TO EXTEND RESPONSIVE PLEADING DEADLINE AND TO CONTINUE CASE MANAGEMENT
 CONFERENCE; [PROPOSED] ORDER

Case No.: C09-01537VRW (ADRO

ORDER

IT IS SO ORDERED that defendants shall have an extension to respond to the complaint from July 7, 2009 to and including **October 7, 2009**. It is further ordered that the Case Management Conference is continued from August 6, 2009 to **November 5, 2009**.

Date: ~~June~~ 7/6, 2009

